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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF MARK C. MAO IN
 SUPPORT OF PLAINTIFFS' MOTION
 FOR LEAVE TO FILE SURREPLY IN
 OPPOSITION TO GOOGLE'S MOTION
 TO DISMISS THE THIRD AMENDED
 COMPLAINT, AND REQUEST FOR
 ORAL ARGUMENT**

The Honorable Richard Seeborg
 Courtroom 3 – 17th Floor
 Date: October 28, 2021
 Time: 1:30 p.m.

DECLARATION OF MARK C. MAO

I, Mark C. Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Google LLC ("Google") has accused Plaintiffs of litigating in bad faith in their recent motion to dismiss. Taking counsel's threats and representations to the Court seriously, Plaintiffs have diligently investigated their facts and allegations.

3. Therefore, after receiving Google's Motion to Dismiss Plaintiffs' Third Amended Complaint, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of October, 2021, at San Francisco, California.

/s/ Mark C. Mao